

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re: Yoan Henriquez : Chapter 13**  
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:  
**Debtor : Case No. 20-12166 PMM**

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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Debtor, Yoan Henriquez, has filed MOTION TO DENY CONFIRMATION OF CHAPTER 13 PLAN, CONVERT CHAPTER 13 CASE TO CHAPTER 11, GRANT DEBTOR LEAVE TO ELECT TO PROCEED AS A SMALL BUSINESS DEBTOR UNDER SUBCHAPTER V OF CHAPTER 11 AND EXTEND DEADLINES with the court.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before **June 17, 2021**, you or your attorney must file a response to the Motion. (see Instructions on next page).**
3. **A hearing on the Motion is scheduled to be held on Thursday, June 24, 2021 at 11:00 a.m., United States Bankruptcy Court, the Gateway Building, 201 Penn Street, 4<sup>th</sup> Floor, Reading, Pennsylvania 19601. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.**

4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.
8. **If you are not required to file electronically,** you must file your response at

U.S. Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Barry A. Solodky, Esquire  
Pauline F. Gibble, Esquire  
Saxton & Stump  
280 Granite Run Drive, Suite 300  
Lancaster, PA 17601  
717-556-1089  
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Respectfully submitted,  
SAXTON & STUMP

Dated: May 25, 2021

/s/ Barry A. Solodky  
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Counsel for Debtor